



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

June 23, 2000

MEMORANDUM TO: Stuart A. Richards, Director
Project Directorate IV & Decommissioning
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

FROM: Jack Cushing, Project Manager, Section 2
Project Directorate IV & Decommissioning
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF THE JUNE 8, 2000, SEMI-ANNUAL MEETING
HELD WITH THE COMBUSTION ENGINEERING OWNERS
GROUP EXECUTIVE COMMITTEE

On June 8, 2000, the NRC staff held a public meeting with the Combustion Engineering Owners Group (CEOG) Executive Committee at the NRC headquarters in Rockville, Maryland. The purpose of the meeting was to exchange information and to provide a forum for discussion of topics related to both the NRC and the CEOG. Attachment 1 is a list of meeting attendees. Attachment 2 is a set of slides presented by the CEOG.

Introduction and Opening Remarks

Sam Collins (Director, Office of Nuclear Reactor Regulation) thanked the CEOG Executive Committee for taking the time to meet with the NRC staff. He recognized that this meeting was a considerable investment of time and resources. Mr. Collins recalled that recent international travel had highlighted the importance of owners groups, especially in a time of utility consolidation. At the CEOG's request, Mr. Collins provided feedback from the staff on the CEOG's performance. Mr. Collins said that the CEOG is responsive to staff requests. In particular, the CEOG's work in the risk-informed area is outstanding. The CEOG has made significant contributions to the maintenance rule, the configuration risk management program, risk-informed regulatory guides, and standard review plans. With respect to risk informed technical specifications, the CEOG is the industry leader; the CEOG's efforts in the area of probabilistic risk assessment (PRA) certifications are also commendable. As a rule, the CEOG's topical reports are of good quality, however the quality of a couple of submittals could have been improved.

In a broader sense, the NRC is concerned that budget assumptions for certain topics are not in line with the apparent work load (e.g., license renewal, license amendments). Mr. Collins asked that the industry respond to the NRC requests for budget assumptions because this information will directly impact future NRC resource availability.

CE Owners Group Report

Ralph Phelps (OPPD) provided an update on the activities of the CEOG. Mr. Phelps reiterated that the CEOG will be maintained as a separate owner's group. Mr. Phelps reviewed the CEOG strategic issues. These issues included: design/licensing basis, reactor plant materials, efforts to shorten refueling outages, and capital cost reductions.

Status of NRC Credit for Joint Engineering Inspections

Gary Detter (CEOG) provided a brief update on the CEOG initiative to conduct joint engineering inspections. The CEOG would like the NRC to recognize and, to some extent, give credit to the participating utilities for their investment in this activity. However, it was noted that the CEOG is committed to this activity regardless of the NRC credit because it is judged by the CEOG Executive Committee as a safety beneficial activity. The CEOG mentioned that they would be willing to let an NRC staff member participate in the joint inspection. The CEOG indicated that they expect to conduct about six inspections per year.

The CEOG stated that a detailed plan is being developed and will be forwarded to the NRC in mid-July. Part of the plan involves discussions with the Nuclear Energy Institute (NEI). The CEOG requested a meeting with the staff in the third quarter of 2000 to discuss their plans.

The NRC stated that it is committed to the baseline inspection plan, but is willing to continue to discuss the CEOG program. The NRC applauded the CEOG for this initiative. The NRC agreed to meet with the CEOG in the third quarter of 2000.

Status of NRC Review of CEOG Topical Reports

Ed Weinkam (FPL) provided an update on the CEOG Topical Reports. The staff's comments regarding the presentation follow:

- The safety evaluation (SE) on Common Q is expected to be issued by the end of June.
- Post accident sampling system (PASS) elimination - the CEOG is working to make plant specific submittals as consistent as possible.
- CENPSD-911 moderator temperature coefficient (MTC) topical report - the technical review is complete and the SE will be issued shortly.
- The request for the approval of the pressure sensor response time testing elimination topical report within one month is a bit optimistic, but it is expected soon.
- The allowed outage time extension for containment isolation valves - the technical review is complete.
- Safe end states - SE expected by October 2000.
- Reactor coolant system pressure/temperature limits report - the NRC understands that this is a high priority topical report; however, a pre-meeting will be necessary to reach an understanding on what date is realistically achievable.

Mr. Weinkamp discussed the ramp up of the CEOG Licensing Subcommittee management of the regulatory interface. The CEOG commented that the regulatory interface has been good, but the CEOG members believe that they will get more benefit and earlier implementation of CEOG topical reports with a more pro-active Licensing Subcommittee.

Open Discussion

Mr. Brian Sheron (Associate Director for Project Licensing and Technical Analysis) discussed several issues of interest to the NRC.

- The NRC is continuing to stimulate support for the Voluntary Industry Initiative. The concept is rather than have the NRC issue generic letters, it is better to engage the industry and let the industry come back with a solution. Win-win examples include the boiling water reactors vessel internals program (BWR VIP) and the industry evaluation of switchyard voltage concerns. The NRC is preparing a paper which outlines a process to assure predictability in how the Voluntary Industry Initiative would work.
- In response to the Indian Point Nuclear Generating Unit No. 2 steam generator (SG) tube failure, the NRC is setting up a lesson learned task force. This is envisioned to be a two-month effort to determine the level of effectiveness of SG reviews. A few of the issues which are being reviewed are the use of high frequency probes, characterization of the SG tubes (deposits) and certain aspects of emergency planning.
- The NRC is continuing to assess the quality of PRA models. It is still an unresolved issue as to how to assess the quality of the PRAs. Currently, the NRC looks at this on a case-by-case review.
- The NRC is continuing its focus on reducing licensing action backlogs. The NRC is becoming more sophisticated in budgeting and it needs better information to be more predictable. The NRC has asked licensees to provide projections on expected licensing actions. The initial result is that the information does correlate very well at some plants.

Summary of Action Items

Jack Cushing (NRC) summarized the actions from the meeting:

- The next CEOG meeting with NRC management will be November 16, 2000.
- The CEOG and NRC will meet on the topic of joint engineering assessment during the third quarter of 2000.
- The CEOG will forward a best estimate plant specific topical report implementation schedule to the NRC in early July 2000.

Having completed the scheduled business, the meeting was adjourned.

Project No. 692

Attachments: 1. Attendance List
2. CEOG Slides

cc w/atts: See next page

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PDIV-2 Reading

SCollins (RidsNrrOd)

BSheron (RidsNrrAdpt)

JZwolinski/SBlack (RidsNrrDlpm)

SRichards (RidsNrrDlpmLpdiv)

SDembek

JCushing (RidsNrrPMJCushing)

EPeyton (RidsNrrLAEPeyton)

JDonohew (RidsNrrPMJDonohew)

RidsOgcMailCenter

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TCollins

JPeralta

DWessman

MJohnson

KLandis

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OFFICE	PDIV-2/PM	PDIV-2/LA	PDIV-2/SC
NAME	JCushing:lcc	EPeyton	SDembek
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CE Owners Group

Project No. 692

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LIST ATTENDEES

NRC'S MEETING WITH THE CEOG

JUNE 8, 2000

<u>NAME</u>	<u>ORGANIZATION</u>
S. Collins	NRC
B. Sheron	NRC
S. Black	NRC
J. Cushing	NRC
J. Donohew	NRC
D. Wessman	NRC
T. Collins	NRC
M. Johnson	NRC
J. Peralta	NRC
R. Bernier	APS
G. Overbeck	APS
C. Cruse	BGE
G. Detter	BGE
N. Haskell	Consumers Energy
J. Hoffpauir	Entergy Operations
R. Kundalkar	FPL
E. Weinkamp	FPL
R. Phelps	OPPD
A. Hackerott	OPPD
M. Schoppman	NEI
R. Necci	Northeast Utilities
D. Nunn	SCE
C. Brinkman	Westinghouse
L. Collins	Westinghouse
G. Bischoff	Westinghouse
M. Barnoski	Westinghouse
P. Hijeck	Westinghouse
P. Leombruni	Westinghouse
S. Lurie	Westinghouse



COMBUSTION ENGINEERING OWNERS GROUP

**CE Owners Group/Nuclear Regulatory Commission
Senior Management Meeting**

**June 8, 2000
Rockville, Maryland**

**Preliminary Agenda
NRC/CEOG Senior Management Meeting
June 8, 2000**

Location: NRC Offices, One White Flint Building, Room 5B4
Rockville, Maryland
Phone: (301) 415-1270

Thursday, June 8, 2000

1:00 pm Introductions and Opening Remarks

Feedback from NRR on the CEOG – Sam Collins (NRC)

The CEOG Executive Committee seeks feedback from the Director of NRR on the regulatory effectiveness of the CEOG based on input from his various staff members.

1:45 pm CE Owners Group Report – Ralph Phelps (OPPD)

2:00 pm Status of NRC Credit for Joint Engineering Inspections – Gary Detter (BGE)

2:30 pm Status of NRC Review of CEOG Topical Reports – Ed Weinkam (FPL)

3:30 pm Open Discussion

4:00 pm Summary of Action Items – Jack Cushing (NRC)

4:10 pm Adjourn

**Summary of the NRC/CEOG Senior Management Meeting
November 18, 1999**

The Executive Committee of the CE Owners Group met with NRC senior management and staff on November 18, 1999 in the NRC offices. This was the second meeting of this nature in 1999.

Following introductions (attendance list attached), Sam Collins (NRC) provided feedback from the Director of NRR on the regulatory effectiveness of the CEOG based on input from his various staff members.

Mr. Collins acknowledged the importance of the CEOG/NRC Senior Management Meetings. He noted that the meetings were beneficial in helping the NRC scheduling their resources and priorities.

Mr. Collins noted that there had been issues between the NRC regarding the length of time and costs associated with the NRC review of topical reports. Both the NRC staff and the CEOG Executive Committee would like to use these meetings to share lessons learned. Sam Collins noted that the NRC hopes to be more predictable with respect to cost and schedule issues in the future. It was also noted that fee exemptions are possible in certain situations and this is being discussed with NEI. Any discussions regarding fee exemptions need to be held before the NRC review is initiated.

On the subject of topical reports, Jim Levine observed that the CEOG and the NRC have been doing a better job on prioritizing the topical reports. However, the CEOG is getting a mixed message regarding the need for lead plants. The NRC agreed to look into this issue and to report back to the CEOG.

It was noted that the NRC is planning to implement a work planning center. A pilot will be ready early next year. An offer was made to include an update on the progress of the work planning center and a tour to be scheduled in conjunction with the next Senior Management Meeting in May 2000.

Another benefit of the Senior Management Meetings is to provide an opportunity to inform the NRC of CEOG long-range intentions so that NRC resources can be adjusted accordingly. Examples of areas where this is critical include license renewal and risk informing Part 50. At the next Senior Management Meeting the CEOG will provide an update on long range intentions (2-5 years).

At the request of the CEOG, Director Collins provided suggestions on areas where the CEOG might consider working together to benefit the NRC. These included:

- Oversight process – The CEOG should compare among yourselves how the pilot process is working across the CEOG members.
- License Renewal – There CEOG members would benefit by developing generic technical reports to facilitate the review and approval process and to provide feedback to the NRC on the sequencing of plants pursuing license renewal.
- Operator licensing – One area for the CEOG to look into is operator licensing. There appears to be a benefit from a consistent exam and question bank for a common NSSS design. In this regard the CEOG can help to ensure consistency. The NRC is reassessing the role of the NRC vis a vis the written exam needs to be evaluated by the NRC.
- Fuel Issues – The CEOG can work together to address extended fuel burnup issues and new fuels such as MOX.

CE Owners Group Report

Ralph Phelps (OPPD and Chairman of the CEOG Management Committee) provided an update of several specific issues related to the CEOG. Ralph reported of progress toward addressing key CEOG strategic initiatives. He noted that the CEOG has recently formed License Renewal Task Force and Section XI Working Group.

Sam Collins noted that the NRC will soon issue an information notice on switchyard reliability. The concern is that switchyard reliability may be impacted by deregulation. A specific concern of the NRC is that there may not be adequate control room monitoring and control capability.

Mr. Phelps acknowledged that both the CEOG and NRC are working to improve communications. A single topical report table being maintained by both the CEOG and NRC, a dedicated NRC Project Manager, NRC PM attendance at CEOG Management Meetings, NRC/CEOG Senior Management Meeting are all examples of this effort. The CEOG offered that continuity of the NRC Project Manager would be beneficial as well as an improved process for estimating and controlling NRC review fees.

The CEOG is somewhat unique among owners group in the extent of self assessment activities conducted through the CEOG. There was considerable discussion of what action is required in order for the CEOG members to receive formal regulatory credit for the CEOG Self Assessment Program. This is a critical issue for the CEOG. There is considerable duplication of effort ongoing – beyond that necessary to satisfy stakeholder concerns and as such there may be opportunities to work with NRC to avoid some of the duplication and to improve the overall quality of self-assessment activities. At this point, Jim Levine suggested that engineering is one area where the CEOG and NRC can work together.

After an open ending discussion regarding the baseline inspection level, Mr. Collins summarized by stating that the NRC door is open but, the CEOG must recognize that there needs to

independence and representation for the independent stakeholder. The CEOG would like to meet with the NRC on this topic in the near term. Director Collins will provide an update on this issue at the next meeting.

NRC/CEOG Regulatory Issues

Angie Krainik (APS and Chair of the CEOG Licensing Subcommittee) reported on several key topical reports under review by the NRC.

- **Elimination of PASS**

The issue is schedule to complete review and issue SER. At the May, 1999 meeting with the CEOG Executive Committee, the NRC committed to provide an SER by September, 1999. The lead CEOG plant, ANO-2, docketed a license amendment application to eliminate their PASS in July, 1999. On October 8, 1999, the ACRS recommended that the NRC approve the CEOG proposal to eliminate PASS. Elimination of PASS remains a high priority project for the CEOG. This is not a Y2K issue for the CEOG. NRC review fees on this topical report to date are \$55.5K against a budget of \$75K. The NRC confirmed that there are no open technical issues with respect to PASS elimination. The NRC will issue a FRN in November and target for an SE in February 2000.

Regarding the process for the non-lead plants to apply for this request, the NRC agreed to pursue a streamlined process for handling follow-on requests.

- **Common Q, Phase 2**

The CEOG is seeking the NRC review and approval for a significant topical report with supplementary information. The scope of the Common Qualified Platform (Common Q) Phase 2 effort is to generically qualify and license the Advant 160 Programmable Logic Controller (PLC) for Class 1E nuclear safety applications. Several lessons learned were discussed related to this project including the necessity of a mutually agreed upon schedule for submissions and reviews, better estimates for NRC review fees and the desire to maintain the same reviewer throughout the project. The NRC is currently finalizing the draft SE and expects to release it internally for review and approval on 11/30/99. A final SER for Phase 2 is anticipated by 2/29/99. A detailed schedule for Common Q Phase 3 activities is being prepared by the CEOG for delivery to the NRC by 12/10/99.

- **Pressure Temperature Limits Report (PTLR)**

A topical report had been submitted to the NRC to relocate the pressure temperature limits to a non-technical specification report. After several rounds of questions, the report was withdrawn

at the request of the NRC. This topic was discussed as a lesson learned such that this situation can be avoided in future submittals.

Sam Collins and Brian Sheron provided clarification that after the first round of questions on the topical report, then the issue should have been raised to a higher level in the NRC organization. Utilities and/or CEOG should take the initiative to raise an issue to upper management. With respect to the lead plant sponsor all parties should discuss the need for a lead plant before the review is initiated. Sam Collins noted that the lead plant drives the review schedule based on need; he also noted that fees may be able to be waived if topical is generic.

NRC Topics

The NRC reported that the NRC plans to closeout GSI-165, Safety Relief Valves. A Resolution Package was distributed which provides some suggestions for which plants to act.

CEOG Risk Informed Initiatives

Alan Hackerott (OPPD and Chairman of the Probabilistic Safety Assessment Subcommittee (PSASC)) provided an update on the CEOG risk informed initiatives.

- GSI-23, RCP Seal Integrity

The issue is applicability of industry RCP seal integrity model to CEOG plants. The CEOG believes that the NRC should exercise engineering judgement in determining the adequacy of NRC seal integrity insofar as GSI-23 is concerned. Application of the Rhodes model to the seal design on CEOG plants is not justified. Additionally, no seal failures have occurred at CEOG member plants nor during testing of RCP seals for Station Blackout (SBO) issues. Nevertheless, the CEOG will develop a seal model and submit the topical report to the NRC for their review and approval. The NRC agreed to meet with the CEOG in December and to receive the report in July 2000.

- Regulatory Credit for CEOG PSA Cross Comparisons

The PSASC has been performing both global and application specific PSA cross comparisons. These efforts support raising the level of quality of member PSAs and directly impacts the confidence in specific PSA applications. Need a common vision – agreement on the goal but, needs to be converted to a process. Not sure what the action is here?

- Issuance of SERs for CEOG PSA Joint Application Reports

The CEOG has requested that the NRC issue SERs on the Joint Application Reports submitted for review and approval. The CEOG would like the SERs to identify any plant specific information that is required for license amendments to help ensure closure in issuing the facility license amendments. The NRC agreed to issue Generic SE on future JARs with conditions that plants have to address when they apply for a plant specific amendment.

- Continuation of Risk Informed Applications Outside of 10 CFR 50 Initiatives

The CEOG has been very successful in working with the NRC on specific risk informed applications such as changes to allowable outage times. The CEOG requested that the NRC devote adequate resources to this area to maintain emphasis on the specific RI applications.

- Challenges for Maintenance Rule Implementation

Recent risk informed changes to the maintenance rule represent a significant improvement and challenge in the conduct of maintenance. The CEOG discussed the desire to interact with the NRC on implementation of the revised maintenance rule to maintain a consistency in inspection.

High Burnup Topical Report

An update was provided on the subject topical report that requests the approval of fuel burnup to 65 MWd/kgU. It was noted that the NRC does not have the resource to invest in the effort to go beyond 62 MWd/kgU without a firm request from a utility. Any approval of the topical report beyond 62 MWd/kgU will need additional data and compelling argument. Gary Hollohan (NRC) suggested that the CEOG consider a risk-informed approach in which case the CEOG may be able to construct licensing basis for beyond 62 MWd/kgU. Brian Sheron noted that the NRC is expending research money in this area and that there may be an opportunity to co-fund and/or share resources. It was noted that there are several LFAs (lead fuel assemblies) that are not getting much regulatory attention.

Y2K Update

Jim Wright (BGE) reported on final plans by the CEOG in preparation for the year 2000 rollover. He noted that the CEOG program is following the NEI 97-07 guidance. The NRC requested a phone number or other communication link to the ABB Y2K Support Center to follow any developments at the KEPCO plants of ABB design. The CEOG agreed to provide the requested information.

The meeting was adjourned at 11:40 am.

**ACTION ITEM LIST FROM
CEOG NOVEMBER 18, 1999, MEETING**

1. NRC Resource Planning

Action

The NRC staff requested the Combustion Engineering Owners Group (CEOG) inform the NRC staff as early as possible about issues that impact NRC resources (license renewal/decommissioning). This information will enable the staff to allocate resources in the most efficient manner.

Resolution

The CEOG agreed to inform the staff of issues that could impact staff resources.

Due Date

Ongoing; report at the June 8th 2000 CEOG/NRC Senior Management Meeting

Responsible Party

CEOG

2. Continuity of NRC Project Manager

Action

The CEOG requested continuity of NRC Project Manager. Turnover in Project Managers can cause communication and scheduling difficulties. The staff stated that the turnover was unusual this past year due to the recent NRR reorganization.

Resolution

In the future the staff agreed to maintain Project Manager continuity within the constraints of resource availability.

Responsible Party

NRC

3. Self Assessments

Action

The CEOG requested regulatory credit for self assessments that the CEOG performs in the Engineering area. The staff responded that the topic is worthy of further dialogue with all stakeholders. Some of the issues involve assuring the NRC independence as a credible regulator, efficient use of NRC resources and reduction in regulatory burden.

Resolution

The issue requires input from all stakeholders. The CEOG would like to meet with the NRC at its earliest convenience to discuss the next steps.

Due Date

February 25, 2000

Responsible Party

CEOG & NRC

4. Post Accident Sampling System Elimination (PASS) Topical Report Schedule

Action

The CEOG requested that the NRC meet the February 2000 due date for review of the PASS topical report.

Resolution

The NRC staff responded that meeting the due date depends on the resolution of stakeholder comments. The staff also made clear that no decision will be made prior to receiving the stakeholder comments. In parallel, the NRC will investigate a streamlined process for approval of PASS elimination applications from individual plants if the topical report is approved.

Due Date

NRC will provide feedback to CEOG on streamlined application process by January 14, 2000 and issue SE on PASS Topical Report by February 25, 2000, provided stakeholders comments can be resolved.

Responsible Party

NRC

5. Common Qualified Platform (Common Q)

Action

To maintain the Common Q on schedule, the CEOG and the NRC will develop a detailed schedule of mutually agreed upon target dates for submittals, requests for additional information (RAI) to be asked and responded to and for safety evaluation reports to be issued.

Resolution and Due Date

The NRC and the CEOG will develop the schedule by December 10, 1999.

Responsible Party

NRC and CEOG

6. Pressure Temperature Limit Report (PTLR)

Action

The CEOG requested a meeting with the staff prior submitting their revised PTLR to discuss the review status.

Resolution

The NRC agreed to meet with the CEOG. The CEOG and NRC will discuss in the pre-application meeting if a lead plant is needed.

Due Date

The meeting will be scheduled for March 2000.

Responsible Party

CEOG and NRC

7. Lead Plant Needed For Topical Reports

Action

The CEOG requested guidance on when a lead plant is needed for a topical report.

Resolution

The staff stated that the issue could be resolved at the pre-application meeting along with the related issue of fees and priority for review.

Responsible Party

NRC

8. GSI-165 Safety Relief Valves

Action

The NRC staff communicated that while GSI-165 is closed, it does contain risk insights that may be useful to Combustion Engineering designed plants.

Resolution

NRC will evaluate the most effective method to communicate this and similar information.

Responsible Party

NRC

9. Reactor Coolant Pump (RCP) Seals

Action

CEOG will develop and submit to the NRC for review an RCP seal model by July 2000. The CEOG requested a meeting with the staff to discuss the model development.

Resolution and Due Date

Schedule meeting in December 1999 to discuss seal model. CEOG to submit seal model by July 2000.

Responsible Party

CEOG and NRC

10. Safety Evaluations for Joint Application Reports

Action

The CEOG requested that the SEs for Joint Application Reports state which plants the report is applicable to and the conditions that the plants will have to address when they apply for a plant specific amendment.

Resolution

The staff agreed.

Responsible Party

NRC

11. Lesson Learned

Action

Include a lesson learned topic in the agenda for the next NRC/CEOG meeting. The lesson learned topic would include items that would improve NRC and CEOG interactions and performance. In addition the status of the action items from the previous meeting will be discussed.

Resolution

NRC and CEOG agreed.

Due Date

Ongoing; report at the May 2000 CEOG/NRC Senior Management Meeting

Responsible Party

NRC and CEOG

12. Y2K

Action

J. Gitten requested contact information on ABB Y2K Support Center to keep abreast of issues arising from millennium change over experience at KEPCO plants with ABB design.

Resolution and Due Date

CEOG will provide phone number and other information as requested by December 10, 1999.

Responsible Party

CEOG

13. Maintenance Rule Implementation

Action

The CEOG and the NRC to meet and hold discussions on developing Maintenance Rule Implementation guidance.

Resolution and Due Date

The NRC agreed to meet with the CEOG on this topic. These meetings may be in conjunction with CEOG PSASC meetings.

Responsible Party

NRC and CEOG

CEOG/NRC SMM

Chairman's Report

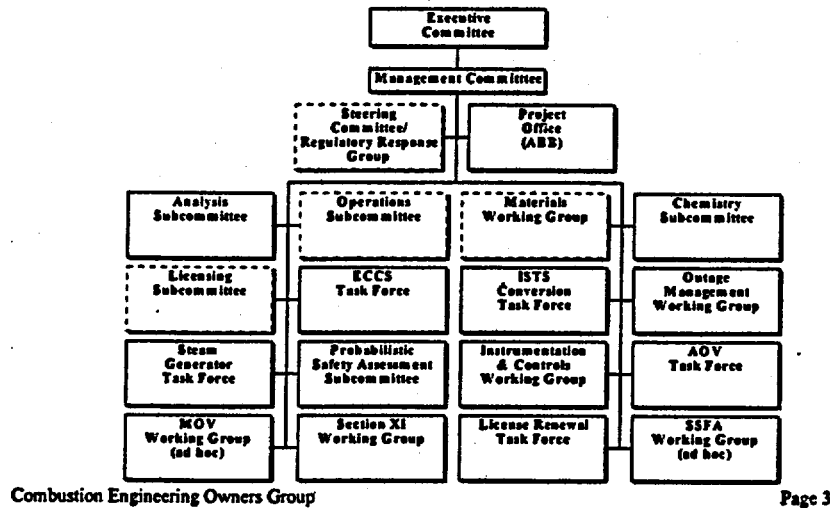
Ralph Phelps

June 8, 2000

Topics

- ◆ **Management Update**
- ◆ **Strategic Technical Issues**
- ◆ **NRC Interface**
- ◆ **Industry Communications**

CEOG Organization



Management Update

- ◆ CEOG Management Committee closely following the BNFL/W acquisition of CE Nuclear
 - Committee formed to interact with the new management
 - No significant resource issues identified to date
 - No structural changes anticipated for the CEOG
 - Several tasks may be candidates for joint CEOG/WOG funding

Topics

- ◆ **Management Update**
- ◆ **Strategic Technical Issues**
- ◆ **NRC Interface**
- ◆ **Industry Communications**

2000 CEOG Strategic Issues

- 1. Steam Generator Integrity**
 - **Tools for Operational Assessments and Condition Monitoring**
 - **Tube-sheet Region Inspections**
 - **Thermally Induced SGTR Analyses**
 - **IP2 Steam Generator Tube Rupture Event**
 - **Coordination with EPRI SGMP**

2000 CEOG Strategic Issues

2. Design/Licensing Basis

- Joint Engineering Inspections (self-assessments)
- License Renewal/Generic Aging Management Reports
- Risk-informed Regulation
- Maintenance Rule Implementation
- RCP Seal Integrity
- ECCS Sump Strainer Performance
- Elimination of MNSA Replacement Requirements
- Extend LBB to Redefine LB LOCA

2000 CEOG Strategic Issues

3. Reactor Plant Materials Issues

- Coordination with EPRI MRP

4. Plant Performance Improvements

- Analysis of UCLF Contributors

5. Shorter Refueling Outages

- Peer Review Program
- Alternate Decay Heat Removal in Mode 6
- Startup Test Elimination, STAR
- Staggered ESF Testing
- Early start of 4th RCP during S/U

2000 CEOG Strategic Issues

6. O&M and Capital Cost Reduction

- Eliminate PASS
- Extend RV ISI Interval
- RI ISI for Class 1 Piping
- License Alloy 600 Nozzle Repairs

7. Equipment Obsolescence

- License Common Q Technology
- Strategic I&C Modernization

Topics

- ◆ Management Update
- ◆ Strategic Technical Issues
- ◆ NRC Interface
- ◆ Industry Communications

NRC Interface

- ◆ Since November, 40 meetings plus frequent phone calls with NRC (several per day)
 - RCP Seal Model
 - RI Technical Specifications
 - PASS Elimination
 - Elimination of response time testing for pressure transmitters
 - PT Limits Report
 - Common Q

Topics

- ◆ Management Update
- ◆ Strategic Technical Issues
- ◆ NRC Interface
- ◆ Industry Communications

Industry Communications

- ◆ **Industry meetings**
 - **WOG meetings on Elimination of LB LOCA**
 - **NEI/OG Coordination meetings**
 - + **BWROG Hot Shorts**
 - + **Joint meeting with FROG**
 - **Support of EPRI MRP and SGMP**
 - **NEI Risk Based Task Force Meetings**
 - **BWROG Maintenance Rule Meeting**

SSFA WORKING GROUP

**STATUS REPORT
JUNE 8, 2000**

G. L. DETTER, CCNPP, CHAIRMAN

Combustion Engineering Owners Group

CEOG Resource Sharing Team Activities, Task 1107

- **Objectives:**
 - ◆ **Reduce duplicative inspections**
 - ✦ **Obtain NRC Recognition of the CEOG initiative to provide self-assessments**
 - ◆ **Improve the quality of engineering self-assessments**
 - ◆ **Add credibility to self-assessments in support of the Revised Regulatory Oversight Process —**
 - ◆ **Reduce overall costs and manpower**

Combustion Engineering Owners Group

June 8, 2000

CEOG Resource Sharing Team Activities, Task 1107

- **Working Group Results:**
 - ◆ SSFAs completed to-date in 2000 for
 - ✦ Waterford 3 (CVCS)
 - ✦ ANO-2 (SFP cooling)
 - ◆ At least two additional SSFAs are currently planned for 2000: APS and Palisades
 - ◆ Four completed in 1999, two in 1998.
 - ◆ NRC meeting held March 2, 2000 to explore NRC credit for SSFA's

Combustion Engineering Owners Group

June 8, 2000

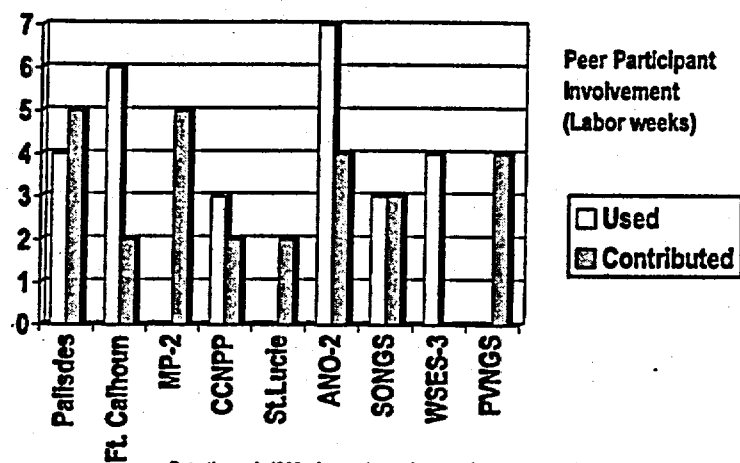
CEOG Resource Sharing Team Activities, Task 1107

- **Near Term Activity**
 - ◆ Meet with NEI regarding integration/prioritization of CEOG effort with other initiatives to attain NRC credit -
- (Jun/July 2000)
 - ◆ Working Group Meeting
 - ✦ Assess NRC and NEI input to develop strategy
 - ✦ Lessons Learned Review
 - ◆ Follow-up meeting with NRC (3Q00)

Combustion Engineering Owners Group

June 8, 2000

CEOG Resource Sharing Team Activities, Task 1107



Data through 1999 plus estimated usage / contribution from May 2000 WSES-3 SSFA.

Licensing Update

Ed Weinkam, FPL

Chairman, CEOG Licensing Subcommittee

CEOG Executive Committee / NRC Meeting

June 8, 2000

CEOG Licensing Update

- **Topical Report Status**
- **Subcommittee Initiative to Manage the Regulatory Interface for All CEOG Tasks**

CEOG Executive Committee / NRC Meeting

June 8, 2000

Topical Reports Under Review

- **CENPD-396-P, Common Q Platform Qualification & Four System Appendices**
- **Benefits:**
 - » **Common Pathway for Digital I&C Upgrades**
 - » **Addresses I&C Obsolescence Issues**
- **Reports Submitted from March to July, 1999**
 - » **Additional Supporting Information Also Provided to NRC**
 - » **Rev 01 of Topical and Appendices Submitted Last Week**
 - » **SE Expected by 6/16/00**
- **Additional Submittals Planned**

CEOG Executive Committee / NRC Meeting

June 8, 2000

Topical Reports Under Review

- **CE NPSD-911, Elimination of End of Cycle MTC Measurement**
- **Benefit:**
 - » **Saves up to 1 Shift of Reduced Power Each Cycle**
- **CEOG recently endorsed WSES-3 10/98 submittal as CEOG Lead Plant**
 - » **WSES-3 Received License Amendment 4/00**
- **SE on CEOG Topical Expected in June**

CEOG Executive Committee / NRC Meeting

June 8, 2000

Topical Reports Under Review

- **CE NPSD-1157 Rev. 01, Elimination of PASS**
 - **System Not Risk-Beneficial**
 - **No Impact on Emergency Management**
- **Benefit:**
 - **Large O&M and Capital Cost Savings**
- **SE Issued 5/16/00**
- **CEOG Members are Collaborating to Submit Similar License Amendment Requests**

CEOG Executive Committee / NRC Meeting

June 8, 2000

Topical Reports Under Review

- **CE NPSD-1167 REV 2, Elimination of Pressure Sensor Response Time Testing**
- **Benefit:**
 - **Cost Savings by Eliminating the Need to Perform RTT on Selected Pressure and Δp Transmitters in the Reactor Protection and Engineered Safeguards Systems**
- **Task Confirmed Results and Applicability of EPRI Study**
 - **NRC Has Approved Similar Reports for WOG and BWO**
- **CCNPP and Palo Verde are Lead Plants**
- **Revision 2 of Topical Submitted Last Month**
 - **Clarification to Appendix A to be Submitted Early June**
 - **SE Expected 1 Month Later**

CEOG Executive Committee / NRC Meeting

June 8, 2000

Topical Reports Under Review

- **CE NPSD-1168, Containment Isolation Valve AOT Extension (Risk Informed T/S Changes)**
 - » AOTs Extended From As Little As 4 Hours to As Long As 7 Days
 - Dependent Upon Class of Valve
- **Benefits:**
 - » Provide Opportunity to Repair CIVs Prior to Required Shutdown
 - » Permits On-line Maintenance
- **SE Expected in June**

CEOG Executive Committee / NRC Meeting

June 8, 2000

Topical Reports Under Review

- **CE NPSD-1184, Risk-Informed DC Power AOT Extension**
 - » Extends 2 Hour AOTs for Battery / DC Bus to 8 or 24 Hours
 - Amount of AOT Extension Depends on Plant Design
- **Benefits**
 - » Provides Opportunity to Make On-Line Repairs for Battery or Charger Problems
- **SONGS Is Lead Plant**
 - » SE Expected by 12/00

CEOG Executive Committee / NRC Meeting

June 8, 2000

Topical Reports Under Review

- **CE NPSD-1186, Risk-Informed Changing Safe Mode End States from Mode 5 to Mode 4**
 - Changes to 29 Tech Specs
- **Benefits**
 - Maintain Plant in Lower Risk Steaming Mode
 - Timely Return to Mode 1
 - Eliminate Need to Perform Mode 5 to Mode 4 Surveillances
 - Minimize Thermal Transients
- **SONGS is lead plant**
 - Topical Submitted to NRC 4/28/00
 - SE Expected by 10/00

CEOG Executive Committee / NRC Meeting

June 8, 2000

Topical Reports Under Development

- **CE NPSD-683 RCS PT Limits Report**
 - Scheduling Meeting with NRC Staff This Month
 - Rev 5 to be Submitted in July
 - CEOG Will Request Expedited Review
 - Needed for OPPD (Spring '01)
- **Global Risk-Informed T/S Changes to 3.0.3 Actions**
 - Submittal in August
- **Risk-Informed RV ISI Interval Extension**
 - Submittal this Fall
- **Analyses of Low Alloy Steel to Support A600/A690 Nozzle Repairs**
 - Submittal in July

CEOG Executive Committee / NRC Meeting

June 8, 2000

Topical Reports Under Development

- **RCP Seal Failure Model**
 - Submittal in July
- **CE NPSD-1041 Joint Application Report for HPSI AOT T/S Modifications**
 - Submittal of Revised Topical TBD
- **Startup Test Time Reduction**
 - Estimated Submittal Early 2001

CEOG Executive Committee / NRC Meeting

June 8, 2000

Managing the CEOG Regulatory Interface

- **The Licensing Subcommittee is Focusing on Managing the Regulatory Interface for All CEOG Activities**
 - **Members of the LSC Are Assigned to Follow and Advise Other CEOG Committees on Regulatory Issues**
 - Members generally assigned to follow committees chaired by a representative from their utility
 - Tasks with lead plant submittals will normally be assigned to the lead plant's representative
 - Facilitates frequent communication and feedback

CEOG Executive Committee / NRC Meeting

June 8, 2000

Managing the CEOG Regulatory Interface

- **Benefits:**

- Support CEOG Strategic Objectives
- Promote Timely Implementation of CEOG Products
- Facilitate Long Term Planning
- Improve Resource Scheduling
 - Utility and NRC Staff
- Promote Commonality Among Submittals

- **LSC and W Licensing Staff will work together to improve and assure consistent Topical Report Quality**

CEOG Executive Committee / NRC Meeting

June 8, 2000

CEOG Topical Reports Under NRC Review

Topical Report Number and Title	Submittal Date and Ref. memo	Lead Plant and Need Date	NRC Lead; TAC No.	Review Status and Comments
CENPD-396-P, (CE-CES-195-P) <i>Common Q Platform Qualification and System Appendices 1-4, (Task 1067)</i> <i>Common Q Phase 3 (Task 1147)</i> (1/2000 – 5/2001) Collette x-9272; Stofko x-9284 Lurie x-9263	Prop = 3/04/99 LD-99-015 Prop = 7/2/99 LD-99-040 NonP = 11/24/99 LD-99-058	Joint Application Report – High Priority. Need = TBD	K.Mortensen 415-2915; MA1677	5/31/00, CEOG Submit Rev 01 of Report and Appendices. Interim SE target = 2/29 3/31 4/28 6/16/00. Final SE target = 3/31/01.
CE NPSD-911 & Amendment 1 (NP) <i>Analysis of Moderator Temperature Coefficients in Support of a Change in the Technical Specifications End-of-Cycle Negative MTC Limit (Task 1009)</i> J.Brown x-5575; Hijeck x-3115	Prop = N/A NonP = 12/9/94, W3F1-94-0131 12/20/94, CEOG-94-714	WSES-3 – Low Priority. Need = TBD	M.Chatterton 415-2889; MA3781	4/11/00, CEOG-00-093 advises Topical to be referenced by all CEOG utilities that apply CE methodology. 5/12/00, CEOG-00-145 clarifies use of CENP methodology. SE target = 6/16/00.
CE NPSD-1167, Rev 01 (NP) <i>Joint Application Report for Elimination of Pressure Sensor Response Time Testing Requirements (Task 1070)</i> D.McQuade x-4653; Lurie x-9263	Prop = N/A NonP = 9/30/99 CEOG-99-304	BG&E, APS – High Priority. APS need date = 8/15/00	P. Loeser 415-2825; MA6010	3/14/00, LD-2000-016 submits FPL, SCE errata sheets. 3/30/00, NRC RAI issued. 4/07/00, CEOG-00-096, CEOG RAI response issued. 4/12/00, FPL advises of error in data. 4/12/00, CEOG-00-108 submitted ABB analysis of errors. 4/19/00, CEOG-00-107, Rev 02 issued for CEOG approval. 5/15/00, CEOG-00-144 submits Topical Rev 02. 5/25/00, forward email draft changes to App A Tech Specs. In June '00, submit revised App A. SE target = 3/40/00 1 mo. after receipt of revised App A.
CE NPSD-1168 (NP) <i>Joint Application Report for Risk Informed TS changes – Ctrmt Isolation Valves AOT Extension. (Task 849)</i> Schneider x-3962; Hijeck x-3115	Prop = N/A NonP = 7/27/99 CEOG 99-239	Lead Plant TBD Need = TBD	R. Lobel 415-2865; M.Wohl 415-1180; MA6288	3/09/00, NRC-PRA branch review completed. 5/09/00, staff preparing safety evaluation. SE target = 4/30/ 5/26 6/16/00.

CEOG Topical Reports Under NRC Review

Topical Report Number and Title	Submittal Date and Ref. memo	Lead Plant and Need Date	NRC Lead; TAC No.	Review Status and Comments
CE NPSD-1184 <i>Joint Application Report for DC Power Allowed Outage Time Extension (Task 849)</i> Schneider x-3962; Hijeck x-3115	Prop = N/A NonP = 3/13/00 CEOG-00-070	SCE – High Priority. Need = 3/01.	N. Gilles 415-1180 MA8517 M.Wohl, J.Knox	4/10/00, review suggests topical may be redundant to proposed Tech Spec changes under review by NRC. SE target = 12/00.
CE NPSD-1186 (NP) <i>Technical Justification for the Risk-Informed Modification to Selected Required Action End States for CEOG PWRs (Task 1115)</i> Schneider x-3962; Hijeck x-3115	NonP = 4/28/00 CEOG-00-121	SCE – High Priority. Need = TBD		4/13/00, CEOG-00-104 issued topical for CEOG review. 4/28/00, CEOG-00-121 submitted report for NRC review. SE target < 10/00.

CEOG Topical Reports Under Development

Topical Report Number and Title	Submittal Date and Ref. memo	Lead Plant and Need Date	NRC Lead; TAC No.	Review Status and Comments
CE NPSD-683, Rev. 04-P <i>Development of a RCS Pressure Temperature Limits Report for the Removal of P-T Limits and LTOP Requirements from the Technical Specifications (Task 1120)</i> Ghergurovich x-4722; Molnar x-5205; Lurie x-9263	7/00	OPPD – High Priority. Need = TBD		2/2000, CEOG to determine requirements and suitability of information to be provided in Rev 04. 2/25/00; NRC requested update on contents of Rev 04 report and plans for submittal.
Global Risk-Informed Tech Spec Changes to 3.0.3 Actions (Task 1115) (NP) Schneider x-3962; Hijeck x-3115	8/18/00	SCE – High Priority. Need = TBD		5/26, SCE reviewing draft report. ~ 6/16, target for CEOG review.
Risk-Informed Reactor Vessel ISI Interval Extension (Task 1133) Ghergurovich x-4722; Hijeck x-3115	Fall 2000	Lead = TBD Need = TBD		Need for topical to be determined. Submittal contingent on resolution of multiple issues; topic discussed with NRC 12/99.
Low Alloy Steel Analyses to Support A600/A690 Nozzle Repairs (Task 1131) J.Hall x-4762; Lurie x-9263	7/00	Lead = TBD Need = TBD		Topical report will reference similar analyses on docketed submittals. SER target ~ 12/00.
RCP Seal Failure Model (Task 1136) (P/NP TBD) D.Finnicum x-3926; Hijeck x-3115	7/07/00	Lead = TBD Need = TBD	TBD	12/13/99, planned seal failure model discussed w/NRC. 2/00, draft topical issued for utility review. 3/29/00, further discussion of model with NRC planned.
Risk-Informed Tech Spec Changes to Mode Transition (i.e., mode 5→ 4→ 3) (Task 1115) Schneider x-3962; Hijeck x-3115	TBD	SCE – TBD Priority. Need = TBD		Changes to be submitted by SONGS via the Improved Std Tech Spec Task Force. CEOG to implement via individual LAR following NRC approval.

CEOG Topical Reports Under Development

Topical Report Number and Title	Submittal Date and Ref. memo	Lead Plant and Need Date	NRC Lead; TAC No.	Review Status and Comments
CENPD-388-P <i>Extension of the 1 Pin Burnup Limit to 62 MWd/kgU for ABB PWR Fuel with OPTIN Cladding (Task 1010)</i> G.P.Smith 687-8070; Lurie x-9263	Prop = 2/16/98 CEOG-98-069 NonP = Resubmit by 12/00	WSES-3 – High Priority. Need = TBD	M. Chatterton 415-2889; MA1058	02/17/00, CEOG-00-032 requested NRC to suspend review and close TAC. Topical to be revised with updated corrosion model. CEOG plans to resubmit by 12/00 SE target = TBD.
CE NPSD-1041 (NP) <i>Joint Application for HPSI System AOT Technical Specification Modifications (Task 849)</i> Schneider x-3962; Hijeck x-3115	Prop = N/A NonP = 3/11/98 CEOG-98-117	WSES-3 – High Priority. Need = TBD	W. Lyon 415-2897; N. Gilles 415-1180 MA1555	1/18/00, NRC called, advised that topical is unacceptable. 02/07/00, CEOG-00-030 requested NRC to suspend review and close TAC. Topical to be revised to limit AOT extension to single header valve OOS. TBD; CEOG to confirm if topical to be resubmitted. SE target = TBD.
<i>Startup Test Time Reduction (Task TBD).</i> H. Jones, x-2233; J. Brown, x-5575; P. Hijeck, x-3115	Early 2001	Lead = TBD Need = TBD		CEOG review and approval of task pending. SE target ~ Fall 2001.

CEOG Topical Reports Completed or Awaiting Implementation

Topical Report Number and Title	Submittal Date and Ref. memo	Lead Plant and Need Date	NRC Lead; TAC No.	Review Status and Comments
CE NPSD-951, Rev 01 <i>Reactor Trip Circuit Breakers Surveillance Frequency Extension (Task 787)</i> Hijack x-3115	7/17/96, Letter W3F1-96-0004	WSES-3 – Medium Priority.	I. Ahmed 415-3252; M96366	6/99, review completed and SER issued. Approved version of Topical Report issued.
CE NPSD-994 (NP) <i>Joint Applications Reports for SIT AOT Extensions (Task 836)</i> Schneider x-3962; Hijack x-3115	7/10/95	SCE – High Priority.	N. Gilles 415-1180; M92981	Review completed, SE issued to SCE ~8/98. SIT AOT change license amendments issued.
CE NPSD-995 (NP) <i>Joint Applications Reports for LPSI AOT Extensions (Task 836)</i> Schneider x-3962; Hijack x-3115	7/10/95	SCE – High Priority.	N. Gilles 415-1180; M92981	SE issued to SCE ~ 9/98. 9/98, LPSI AOT extension issued to SCE. SL-1,2 LAR submitted 6/1/99; approved 2/15/00. PV-1,2,3 LAR approved 2/99. WA-3 approval target = 5/30/00.
CE NPSD-996 (NP) <i>Joint Applications Reports for EDG AOT Extensions (Task 836)</i> Schneider x-3962; Hijack x-3115	7/10/95	SCE – High Priority.	N. Gilles 415-1180; M92981	SE issued to SCE ~ 9/98. EDG AOT extension issued to SCE in 9/98. SL-1,2 LAR approved 3/99. WA-3 LAR approved 7/99. WA-3 approval pending; target = 4/05/00.
CE NPSD-1045 (NP) <i>Joint Applications Report for CS System AOT Technical Specifications Modifications (Task 849)</i> Schneider x-3962; Hijack x-3115	Prop = N/A NonP = 4/6/98 CEOG-98-155	APS – High Priority.	N. Gilles 415-1180; MA1956	12/21/99, NRC SE issued approving report. 4/11/00, CEOG-00-098 submitted approved topical report. 5/15/00, target approval date for WA-3 LAR.

CEOG Topical Reports Completed or Awaiting Implementation

Topical Report Number and Title	Submittal Date and Ref. memo	Lead Plant and Need Date	NRC Lead; TAC No.	Review Status and Comments
CE NPSD-1085 <i>CEOG Response to NRC GL 97-01, Degradation of CEDM Nozzle and Other Vessel Closure Head Penetrations (Task 992)</i> J. Hall x-4762; Lurie x-9263	7/97	All CEOG members – High Priority.	Jim Medoff 415-2715; MA0203	3/21/99, J. Strosnider (NRC) letter to D. Modeen (NEI) issued advising that vessel head penetration issue closed and review completed.
CE NPSD-1157, Rev 01 (NP) <i>Elimination of Post-Accident Sampling System from Plant Design and Licensing Basis (Task 1072)</i> Schneider x-3962; Lurie x-9263	NonP = 3/30/00, CEOG-00-085	ANO-2 – High Priority.	Pat Sullivan 415-2223; MA5661	3/30/00, CEOG-00-085 issued Topical Rev 01. 4/14/00, CEOG-00-101 submitted changes to address RG1.97 requirements. 5/16/00, NRC Safety Evaluation issued. Approved Topical issued = TBD.